

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-60117-CR-LEIBOWITZ

UNITED STATES OF AMERICA,

Plaintiff,

v.

SANJAY SINGH,

Defendant.

/

**DEFENDANT'S EXHIBIT LIST**

| PRESIDING JUDGE<br>Hon. David S. Leibowitz |         |              |        |          | ASSISTANT UNITED STATES ATTORNEY<br>Robert Moore/Roger Cruz | DEFENDANT'S ATTORNEY<br>Abigail Becker/Victor Van Dyke |
|--|---------|--------------|--------|----------|---|--|
| TRIAL DATE<br>October 7, 2024              |         |              |        |          | COURT REPORTER  | COURTROOM DEPUTY<br>Tamisha Shotwell                   |
| PLF. NO.                                   | EX. NO. | DATE OFFERED | MARKED | ADMITTED | DESCRIPTION OF EXHIBITS                                     |  |
|  | A-1     |              |        |          | USDOT FMCSA Safety Investigation August 2021                |  |
|  | A-2     |              |        |          | USDOT FMCSA Safety Investigation February 2023              |  |
|  | A-3     |              |        |          | USDOT FMCSA Vehicle/Equipment List                          |  |
|  | A-4     |              |        |          | RBL upgrade request to FMCSA 9/27/21                        |  |
|  | A-5     |              |        |          | FMCSA upgrade to conditional 10/15/21                       |  |
|  | B-1     |              |        |          | Makin Capital file 9/9/22                                   |  |
|  | B-2     |              |        |          | Makin Capital file 3/14/23                                  |  |
|  | B-3     |              |        |          | Rand Short Term Loan Agreement 12/1/22                      |  |
|  | B-4     |              |        |          | Rand Short Term Loan Agreement 1/11/23                      |  |
|  | B-5     |              |        |          | GoMotive fba Keep Truckin Invoices                          |  |
|  | B-6     |              |        |          | GoMotive fba Keep Truckin Invoices 2                        |  |
|  | B-7     |              |        |          | GoMotive Daily Log Jorge Santos                             |  |
|  | B-8     |              |        |          | traffic crash file  |  |
|  | B-9     |              |        |          | Rand driver counseling form 8-15-22                         |  |
|  | B-10    |              |        |          | Fleet Policy and Procedure Manual 10-15-21                  |  |
|  | B-11    |              |        |          | Fleet Safety Policies and Procedures Manual                 |  |
|  | B-12    |              |        |          | Safety Management Plan                                      |  |
|  | B-13    |              |        |          | Motive invoice for ELDs and service 10/19/22                |  |
|  | B-14    |              |        |          | Request to upgrade FMCSA rating                             |  |
|  | B-15    |              |        |          | GoMotive invoice 8-30-22                                    |  |

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|--|------|--|--|--|---|
|  | B-16 |  |  |  | GoMotive invoice 5-20-22                                  |
|  | B-17 |  |  |  | Rand email process to approve repairs 11-16-22            |
|  | B-22 |  |  |  | Rand email re driver-employee discipline 9-8-22           |
|  | B-38 |  |  |  | Rand email of resignation 2-8-23                          |
|  | C-1  |  |  |  | Fleet Safety Policies & Procedures Manual                 |
|  | C-2  |  |  |  | Internal Hours of Service Procedures 10-14-21             |
|  | C-3  |  |  |  | LeClair email re MVR Monitoring with JJ Keller 8-13-21    |
|  | C-4  |  |  |  | LeClair email re enrolling in health ins                  |
|  | C-5  |  |  |  | email re fleet management                                 |
|  | D-1  |  |  |  | Email between Kara Cooper and Laine D'Orvilliers 3-23-22  |
|  | D-2  |  |  |  | Kara Cooper Certificate of Liability Insurance Axle       |
|  | D-3  |  |  |  | Kara Cooper Certificate of Insurance Prime                |
|  | D-4  |  |  |  | Kara Cooper Truck Invoice                                 |
|  | D-5  |  |  |  | Cooper Convoy Articles of Organization                    |
|  | E-1  |  |  |  | Diesel Diagnostics Records                                |
|  | F-1  |  |  |  | RBL All Tests 7-1-21 - 12-31-21                           |
|  | F-2  |  |  |  | RBL All Tests 1-1-22 - 6-30-22                            |
|  | F-3  |  |  |  | RBL all Tests 7-1-22 - 12-31-22                           |
|  | F-4  |  |  |  | USDOT Drug and Alcohol Annual Report 2022                 |
|  | F-5  |  |  |  | 1Q23 Random Urine Drug Test Selections                    |
|  | F-6  |  |  |  | Certificate of Enrollment in Drug and Alcohol Program RBL |
|  | F-7  |  |  |  | RBL INVOICE DETAIL 2018-2023                              |
|  | F-8  |  |  |  | RBL LIST OF DRUG TESTS BY DRIVER 2018-2023                |
|  | G-1  |  |  |  | Tenstreet invoices  |
|  | G-2  |  |  |  | Tenstreet Master Services Agreement                       |
|  | G-3  |  |  |  | UnitedHealthCare Group Policy 9-15-21                     |
|  | G-4  |  |  |  | UnitedHealthCare Group Policy 9-1-22                      |
|  | G-5  |  |  |  | UnitedHealthCare Record of Payment                        |
|  | H-1  |  |  |  | email Karen Wolsey to Manohar requesting credit app       |
|  | H-2  |  |  |  | YC Credit application                                     |
|  | H-3  |  |  |  | email Manohar to Wolsey w completed credit app            |
|  | H-4  |  |  |  | Manohar completed credit app                              |
|  | H-5  |  |  |  | Manohar 6-15-23 email with credit app and supporting docs |
|  | H-6  |  |  |  | Manohar 6-15-23 credit app                                |
|  | I-1  |  |  |  | email w pics of Costello reefer trailer                   |
|  | I-2  |  |  |  | invoice Costello reefer                                   |
|  | I-3  |  |  |  | email w pics of Costello's 2nd truck                      |
|  | I-4  |  |  |  | Costello email re adding 2nd truck for wife               |
|  | I-5  |  |  |  | Costello email re toll violation                          |
|  | I-6  |  |  |  | Costello toll violation                                   |
|  | I-7  |  |  |  | Costello email re RE investment                           |
|  | I-8  |  |  |  | email re Costello truck totaled                           |

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|  | I-9  |  |  |  | Costello email re RBL working w insurance re totaled truck                            |
|  | I-10 |  |  |  | email re cooling off period   |
|  | I-21 |  |  |  | Singh email re letting 2 <sup>nd</sup> one finalize before 4 <sup>th</sup> investment |
|  | J-1  |  |  |  | draft term sheet RBL and Big Charter  |
|  | J-2  |  |  |  | web application userguide v1.0  |
|  | J-3  |  |  |  | photo trailer manufacturing   |
|  | J-4  |  |  |  | photo trailer manufacturing 2   |
|  | J-5  |  |  |  | photo trailer manufacturing 3   |
|  | J-6  |  |  |  | FLY BIG ACCOUNTS MAY-JUNE   |
|  | J-7  |  |  |  | Binding Term Sheet  |
|  | J-8  |  |  |  | Engagement letter 1-1-21  |
|  | J-9  |  |  |  | BL 5-28-21 Invoice  |
|  | J-10 |  |  |  | BL 7-7-21 Invoice   |
|  | J-11 |  |  |  | BL 10-26-21 Invoice   |
|  | J-12 |  |  |  | BL 11-26-21 Invoice   |
|  | J-13 |  |  |  | BL 1-10-22 Invoice  |
|  | J-14 |  |  |  | BL 4-4-22 Invoice   |
|  | J-15 |  |  |  | BL 4-4-22 Invoice   |
|  | J-16 |  |  |  | BL 7-14-22 Invoice  |
|  | J-17 |  |  |  | BL 2-10-21 Invoice  |
|  | J-18 |  |  |  | BL 2-22-21 Invoice  |
|  | J-19 |  |  |  | BL 3-31-21 Invoice  |
|  | J-20 |  |  |  | BL 4-30-21 Invoice  |
|  | J-21 |  |  |  | BL 5-31-21 Invoice  |
|  | J-22 |  |  |  | BL 6-30-21 Invoice  |
|  | J-23 |  |  |  | BL 7-31-21 Invoice  |
|  | J-24 |  |  |  | BL 8-31-21 Invoice  |
|  | J-25 |  |  |  | BL 9-30-21 Invoice  |
|  | J-26 |  |  |  | BL Employee Payroll   |
|  | J-27 |  |  |  | BL Touchmedia Invoice 7-3-23  |
|  | J-28 |  |  |  | RBL Driver App User Guide   |
|  | J-29 |  |  |  | BL RBL engagement letter 9-1-21   |
|  | J-30 |  |  |  | BL Touchmedia Invoice 1-5-23  |
|  | J-31 |  |  |  | BL Touchmedia Invoice 3-1-23  |
|  | J-32 |  |  |  | BL Touchmedia Invoice 4-2-23  |
|  | J-33 |  |  |  | BL Touchmedia Invoice 11-3-22   |
|  | J-34 |  |  |  | BL 4-1-22 Invoice   |
|  | J-35 |  |  |  | BL 8-15-22 Invoice  |
|  | J-36 |  |  |  | BL 7-10-22 Invoice  |
|  | J-37 |  |  |  | BL 6-25-22 Invoice  |
|  | J-38 |  |  |  | BL 9-15-22 Invoice  |
|  | J-39 |  |  |  | BL 2-26-22 Invoice  |

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| J-40 |  |  |  | BL 3-13-22 Invoice                          |
| J-41 |  |  |  | BL 3-26-22 Invoice                          |
| J-42 |  |  |  | BL 8-25-22 Invoice                          |
| J-43 |  |  |  | BL 7-20-22 Invoice                          |
| J-44 |  |  |  | BL 9-27-22 Invoice                          |
| J-45 |  |  |  | BL 4-14-22 Invoice                          |
| J-46 |  |  |  | BL 11-28-22 Invoice                         |
| J-47 |  |  |  | BL 12-26-22 Invoice                         |
| J-48 |  |  |  | BL 1-26-23 Invoice                          |
| J-49 |  |  |  | BL 2-26-23 Invoice                          |
| J-50 |  |  |  | BL 4-17-23 Invoice                          |
| J-51 |  |  |  | BL 4-26-23 Invoice                          |
| J-52 |  |  |  | BL 5-30-23 Invoice                          |
| J-53 |  |  |  | BL 3-27-23 Invoice                          |
| J-54 |  |  |  | RBL Web Application User Guide 10-2-21      |
| J-55 |  |  |  | BL Touchmedia Invoice 1-5-23                |
| J-56 |  |  |  | EXPENSE SHEET 2022 - 2023                   |
| J-57 |  |  |  | Chavan email re payment request 9-28-22     |
| J-58 |  |  |  | Chavan email re payment request 9-7-22      |
| J-59 |  |  |  | BL BOL for trailers                         |
| J-60 |  |  |  | BL Invoice for trailer shipment             |
| J-61 |  |  |  | BL Invoice for trailer shipment 2           |
| J-62 |  |  |  | BL tax invoice for trailer shipment         |
| J-63 |  |  |  | M/S Black Lion Translink                    |
| J-64 |  |  |  | BL Brown Bull Logistics                     |
| J-65 |  |  |  | Reliance General Ins re shipment            |
| J-66 |  |  |  | RBL Payment for dry trailer                 |
| J-67 |  |  |  | trailer photo                               |
| J-68 |  |  |  | trailer photo 2                             |
| J-69 |  |  |  | trailer photo 3                             |
| J-70 |  |  |  | BL 1-26-23 Invoice                          |
| J-71 |  |  |  | BL 7-7-21 Invoice                           |
| J-72 |  |  |  | BL 11-26-21 Invoice                         |
| J-73 |  |  |  | Chavan email weekly deposit to BL 5-5-23    |
| J-74 |  |  |  | Chavan email re shipping bill 8-25-22       |
| J-75 |  |  |  | Chavan email w BL balance sheet 8-29-22     |
| J-76 |  |  |  | BL balance sheet                            |
| J-77 |  |  |  | Chavan email w engagement letter 9-3-22     |
| J-78 |  |  |  | Chavan email w shipping bill invoice 9-8-22 |
| J-79 |  |  |  | Brown Bull invoice 9-8-22                   |
| J-80 |  |  |  | BL Touchmedia Invoice 1-2-23                |
| J-81 |  |  |  | BL 10-3022 Invoice                          |

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| J-82 |  |  |  | Chavan email re FLYBIG May Data                       |
| J-83 |  |  |  | FLYBIG May Data                                       |
| J-84 |  |  |  | email re BigCharter Term Sheet 6-3-23                 |
| J-85 |  |  |  | BL Touchmedia Invoice 2-4-23                          |
| J-86 |  |  |  | Big Charter MOU 5-2-23                                |
| J-87 |  |  |  | Chavan email re RBL application 10-13-21              |
| K-1  |  |  |  | New Driver Training Materials                         |
| L-1  |  |  |  | ADP Materials   |
| L-2  |  |  |  | ADP Materials 2                                       |
| L-3  |  |  |  | ADP Materials 3                                       |
| L-4  |  |  |  | Mulkey email re offering health ins                   |
| L-5  |  |  |  | Employee Medical Benefits Open Enrollment Guide       |
| L-6  |  |  |  | employment offer letter to mechanic Zachary Rimer     |
| L-10 |  |  |  | Mulkey email re trucks waiting for pickup             |
| L-15 |  |  |  | Mulkey Indeed candidate email                         |
| L-23 |  |  |  | Mulkey Indeed application email                       |
| L-28 |  |  |  | Letus LLC Week Settlement 16                          |
| L-40 |  |  |  | Truck Spreadsheet                                     |
| L-51 |  |  |  | Mulkey Affidavit                                      |
| M-1  |  |  |  | New Asset Acquisition Checklist                       |
| N-1  |  |  |  | Rashtrawar credit application                         |
| O-1  |  |  |  | Fw_ RBL Investment Update                             |
| P-1  |  |  |  | load tracker  |
| P-2  |  |  |  | load spreadsheet                                      |
| Q-1  |  |  |  | Truck and Trailer Inspection Checklist                |
| Q-2  |  |  |  | Gutierrez email re repair approval 4-23-21            |
| Q-3  |  |  |  | S Singh email re uploading BOLs 5-21-19               |
| Q-4  |  |  |  | R Gutierrez CV  |
| Q-5  |  |  |  | S Singh email naming R Gutierrez Director Ops 7-31-19 |
| Q-6  |  |  |  | truck inspection form                                 |
| R-1  |  |  |  | Hueber email re draft lease TX dealership 4-21-23     |
| R-2  |  |  |  | Provost draft lease TX dealership                     |
| S-1  |  |  |  | truck spreadsheet                                     |
| S-2  |  |  |  | JJ Keller contract for MVR monitoring service         |
| S-3  |  |  |  | payment receipt for monthly JJ Keller services        |
| S-4  |  |  |  | Prime Insurance                                       |
| S-5  |  |  |  | Wex Purchase Summary 1-1-21 - 9-30-22                 |
| S-6  |  |  |  | Axle insurance phys damage policy                     |
| S-7  |  |  |  | AMEX 2022 year end statement                          |
| S-8  |  |  |  | GoMotive 5-20-22 invoice                              |
| Z-4  |  |  |  | Several mechanics in front of hangar                  |
| Z-5  |  |  |  | Side view of trailer in hangar                        |

|  |      |  |  |  |  |
|--|------|--|--|--|--|
|  | Z-6  |  |  |  | Side view of trailer in hangar #2        |
|  | Z-7  |  |  |  | Back view of trailer doors               |
|  | Z-8  |  |  |  | Trailer manufacturing with side panels   |
|  | Z-9  |  |  |  | Several trucks parked inside hangar      |
|  | Z-10 |  |  |  | Trailer panels being installed           |
|  | Z-11 |  |  |  | Tanks filled with tires for load testing |
|  | Z-12 |  |  |  | Hangar entrance photo                    |
|  | Z-14 |  |  |  | Trucks parked inside hangar              |
|  | AA-1 |  |  |  | Bellony Google chat                      |

Respectfully submitted,

HECTOR DOPICO  
FEDERAL PUBLIC DEFENDER

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### **CERTIFICATE OF SERVICE**

I HEREBY certify that on October 23, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: /s/ Abigail Becker